

cc  
Chad. Horne ✓  
to proposed Montana  
PSD regulations  
g.

Statement of Kenneth G. Reick,  
Environmental Supervisor

ANACONDA ALUMINUM COMPANY  
COLUMBIA FALLS, MONTANA

(For Robert A. Sneddon, Plant Manager)

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BOARD OF HEALTH HEARING, SEPTEMBER 17, 1982

My name is Kenneth Reick. I am environmental supervisor at the Anaconda Aluminum Company, Columbia Falls Reduction Plant. My statement relates to the proposed PSD regulations and is presented on behalf of Mr. Robert A. Sneddon, Plant Manager.

The Anaconda Aluminum Company has carefully reviewed the proposed PSD regulations. We appreciate your consideration of our previous comments submitted on PSD rules. We will continue to support Montana's efforts to obtain delegation of the federal PSD program.

There is still one major shortcoming to the proposed rule. The rule now provides a statewide baseline date of March 26, 1979 for sulfur dioxide and March 19, 1982 for particulate matter. This action will result in many existing source emissions being counted against the increment, rather than against the baseline. In addition, it will cause administrative problems for the Air Quality Bureau and for permit applications. Anaconda Aluminum Company requests that further consideration be given to establishing a site specific baseline.

Major modifications will require a PSD permit under the proposed rule. Certain actions are not considered to be major modifications. For example, a change in fuel or raw material which the source could accommodate on January 5, 1975 does not constitute a major modification. Such changes could result in increases or decreases in "actual emissions". Increases in actual SO<sub>2</sub> emissions occurring after the proposed March 26, 1979 baseline date would be counted

against the increment, even though a permit was not required for the increase. We believe that emission increases or decreases at unmodified sources are properly counted as part of the baseline, not as part of the increment. A site specific baseline date will cause such emission changes to be counted only after a PSD application has been submitted which affects the baseline area.

Anaconda Aluminum Company would like to provide the following example of the impact of a statewide baseline date:

The reduction cells at the Columbia Falls plant use anodes made from petroleum coke with coal tar pitch as a binder. Sulfur in the coke is converted to sulfur dioxide and emitted as the anode is consumed in the reduction process. The sulfur content of the petroleum coke varies depending on the source of supply being used. Crude oil used as a feed stock for the petroleum coke is the source of the sulfur. Because of changes in crude oil being used, we have seen an increase in the sulfur content of our petroleum coke supply.

If a baseline date of March 26, 1979 is used for sulfur dioxide, the emissions increase from this change in raw materials must be counted against the increment. Preliminary dispersion modeling of plant emissions indicate that a small increase of sulfur in our petroleum coke supply would consume the  $5 \mu\text{g}/\text{M}^3$  24-hour  $\text{SO}_2$  increment allowable under the PSD rules in Glacier National Park, a Class I area. Five micrograms of  $\text{SO}_2$  per cubic meter of air is such an infinitesimal concentration that it is very close to the lower detection limit of continuous monitoring instrumentation available for ambient air measurement of  $\text{SO}_2$ .

The proposed baseline date would preclude further expansion or major modification of the Columbia Falls aluminum plant. It would have the same effect on any new industry, which may be an  $\text{SO}_2$  source, wishing to locate in the Columbia Falls area.

Anaconda Aluminum Company urges you to adopt a site and pollutant specific baseline date as allowed in the federal PSD regulations. Adopting the federal regulation for the baseline date will provide adequate protection for the environment while still allowing some economic development.